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**Re: January 15th Draft FS Submittal (Lower Willamette River, Portland Harbor
Superfund Site, USEPA Docket No: CERCLA-10-2001-0240)**

Chip and Kristine:

Enclosed please find the preliminary information that you requested in advance of the Draft Feasibility Study. These documents are provided as required by EPA's October 7, 2011 letter, which recognizes that the information we are providing is preliminary and draft. The LWG is still completing the detailed analyses required for the draft FS, and these documents, and the preliminary analyses and conclusions contained in them, may change as the LWG refines its evaluations and finalizes the draft FS report.

To avoid confusion that may arise out of multiple or different drafts, the LWG requests that EPA restrict distribution of these materials to its project team; we think readers who have not been closely involved in development of the FS will find the information easier to understand in the context of the full draft report in March.

As we have previously explained, it is important that EPA also not reach conclusions based on this early work product in isolation but rather that EPA base its review and evaluation of the FS in the context of the draft as a whole. We appreciate EPA's commitment not to provide comments on these interim work products, as it will be impossible for us to revise the draft FS to incorporate any such comments prior to the March deadline. We also understand from EPA that there will not be any substantive changes to the draft risk assessments currently being reviewed by EPA. As EPA is aware, any substantive changes to the risk assessments could potentially require the LWG to start over on major portions of the FS.

As EPA has requested, we will describe significant changes to the work products in the cover letter transmitting the draft FS report.

Sincerely,



Bob Wyatt

cc: Confederated Tribes and Bands of the Yakama Nation
 Confederated Tribes of the Grand Ronde Community of Oregon
 Confederated Tribes of Siletz Indians of Oregon
 Confederated Tribes of the Umatilla Indian Reservation
 Confederated Tribes of the Warm Springs Reservation of Oregon
 Nez Perce Tribe
 Oregon Department of Fish & Wildlife
 United States Fish & Wildlife
 Oregon Department of Environmental Quality
 LWG Legal
 LWG Repository

Table 1. Summary of EPA Required 1/15/2012 Deliverables

EPA Required 1/15/12 Deliverables Items	Attached Responsive Documents
Draft FS Report Table of Contents	Table of Contents
Preliminary Remediation Goals (PRGs)	<ul style="list-style-type: none"> • Table 3.5-2 Focused PRGs and Path Forward for the Draft FS. • Appendix Da - Tables 1, 2, 3, and 4
Description of Alternatives	<ul style="list-style-type: none"> • Table 7.0-1 Summary Description of Draft FS Comprehensive Alternatives for Portland Harbor
<u>For each Alternative:</u>	
1. Maps showing areas of active remediation and identifying technologies.	<ul style="list-style-type: none"> • Figures 7.3-1 through 7.3-10 Technologies Applied for Removal and In-Place Focused Alternatives • Figures 5.3-1a-e Summary of SMAs Designated by Alternatives B-F
2. FS-level cost estimates at Site-wide and SMA-specific scales.	<ul style="list-style-type: none"> • Table 7.0-1 Summary Description of Draft FS Comprehensive Alternatives for Portland Harbor • Appendix K - Table 2 Summary of Quantities and Cost
3. Active remediation areas, engineered cap areas, in situ treatment areas, EMNR areas, and dredge/volumes for each alternative at Site-wide and SMA-specific scales.	<ul style="list-style-type: none"> • Table 7.0-1 Summary Description of Draft FS Comprehensive Alternatives for Portland Harbor • Appendix K - Tables 2, 9, and 10.
4. Time to completion (construction) estimates.	<ul style="list-style-type: none"> • Table 7.0-1 Summary Description of Draft FS Comprehensive Alternatives for Portland Harbor
5. Graphs of time zero sediment SWAC recovery curves for each Alternative at PRG-specific biologically appropriate scales. PRGs should be shown on the curves. Graphs at Time 10, Time 20, etc., should also be available (similar to examples that LWG presented at June 2011 check-in).	<ul style="list-style-type: none"> • Appendix Fa - Two sets of 793 graphs showing Time Zero SWACs for each PRG by chemical and exposure area in log transformed and non-log transformed scales • Appendix Db - Twelve figures showing RAL curves at Time Zero, Year 10, and Year 30 <p>[Note that Year 10+ graphs can only be provided for modeled contaminants]</p>
6. Tissue recovery curves for each alternative at PRG-specific, biologically appropriate scales. PRGs should be shown on the curves. (LWG presented examples at June 2011 check-in.)	<ul style="list-style-type: none"> • Appendix Hb - Figures 5-1 through 5-5 (Site-wide and Segment graphs for PCBs) • Appendix Hb - Attachment 1 - Figures 3-1 through 3-31 (RM E, RM W, RM C graphs for PCBs)
7. Maps showing QEAFATE predicted sediment concentrations, starting at time zero.	<ul style="list-style-type: none"> • Appendix U - Figures 3.1-1 through 3.1-15 Time Series Graphs of Surface Sediment (Top 1-ft) Concentrations (Site, Segment, and River Mile Averages) <p>["Maps" do not exist for this metric]</p>

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EPA Required 1/15/12 Deliverables Items	Attached Responsive Documents
<p>Graphs showing short-term water quality exceedance predictions. Include any other model outputs demonstrating construction impacts to surface water and sediment bed downstream of the construction site.</p>	<ul style="list-style-type: none"> • Appendix U - Figures 4.1-1 through 4.1-5 Volume Days Exceeding Water Quality Criteria during Remedy Construction Period • Appendix U - Figures 3.2-1 through 3.2-5 Long Term Model-Predicted Water Column Concentrations • Additional graphs regarding downstream sediment bed provided below
<p>Maps showing differencing bathymetry at the highest possible level of resolution. Maps should be SMA scale.</p>	<ul style="list-style-type: none"> • Figure 2.1-2 Bathymetric Change - July 2002 to January 2009
<p>Outputs of propwash scour analysis and visual aids that will be provided in the draft FS report and other empirical lines of evidence used to evaluate MNR.</p>	<ul style="list-style-type: none"> • Figures 6.2-2 through Figure 6.2-17 Various • Tables 6.2-1 through 6.2-5 Various
<p>Outputs of recontamination analysis and visual aids that will be provided in draft FS Report</p>	<ul style="list-style-type: none"> • Appendix U - Tables 4.2-1 through 4.2-5 Maximum Average Near Downstream Concentration Increase Resulting from Remediation of SMA ($\mu\text{g/kg}$) • Appendix U - Figures 3.3-1 through Figure 3.3-5 Time Series of Surface Sediment (Top 1-ft) Contaminant Concentrations of Capping Cells in Example SMAs
<p>Maps showing Hot Spots, as defined by DEQ regulations</p>	<p>Discussion of Potential Oregon Hot Spot Evaluation Methods for the Portland Harbor Draft Feasibility Study Including Map</p>
<p>Chart comparing time to construct and meet RAOs for all alternatives</p>	<p>Table 9.5.4-1 Summary of Lower, Mid, and Upper Estimated Times to Achieve RAOs (Years) in Sediments (for PCBs, BaP, and DDE) and Smallmouth Bass (SMB) Tissue (for PCBs only) by Segment. (Ranges represent low and high values as determined through fate and transport model or food web model uncertainty analyses per Appendices Ha and Hb as well as a RG ranges from 95th to >99th percentile estimates.) ["Chart" does not exist. Time to construct provided in Table 7.0-1.]</p>
<p>Chart comparing relative costs for all alternatives</p>	<p>Figure 9.7-1 Net Present Value by Alternative</p>